

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

WILLIAM CATALANO,	)	
	)	
Plaintiff,	)	Case No.: 4:20-cv-1559
	)	
vs.	)	Circuit Court of the 22nd Judicial
	)	Circuit, St. Louis City, Missouri
AMEREN SERVICES COMPANY,	)	Case No. 2022-CC09714
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

COMES NOW Defendant, Ameren Services Company (“Ameren”), by and through its attorneys, TUETH KEENEY COOPER MOHAN & JACKSTADT, P.C, and pursuant to 28 U.S.C. §§ 1331, 1441, and 1446 hereby removes the above-captioned case from the Twenty-Second Judicial Circuit Court of St. Louis City, State of Missouri, to the United States District Court for the Eastern District of Missouri. In support of this removal, Ameren states the following to the Court:

1. On August 27, 2020, Plaintiff William Catalano, (“Plaintiff”) filed a Petition (“Petition”) in the Twenty-Second Judicial Circuit Court of St. Louis City, Missouri, Case No. 2022-CC09714.
2. Ameren was served with a copy of the Petition on October 1, 2020.
3. This Notice of Removal is timely under 28 U.S.C. § 1446 (b) as this Notice is being filed “within 30 days after receipt by defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief.”
4. Pursuant to 28 U.S.C. § 1446 (a), attached to this Notice of Removal is a copy of the original St. Louis City, Missouri, State Court File, attached hereto as **Exhibit A**.

5. Ameren has not filed an Answer or otherwise responded to Plaintiff's Petition in the Circuit Court of St. Louis City, Missouri.

6. Pursuant to 28 U.S.C. § 1331, and as explained further below, this Court has original jurisdiction over the instant action based on Plaintiff's claims arising under the Americans with Disabilities Act, as amended ("ADA"), 42 U.S.C. §§ 12101, *et seq.* See Petition, ¶¶ 1 and 56.

7. The Court has supplemental jurisdiction over Plaintiff's claims deemed to arise under the laws of the state of Missouri pursuant to 28 U.S.C. § 1367.

8. Venue of this removal is proper under 28 U.S.C. § 1441 (a) because this Court is the United States District Court for the district and division corresponding to the place where the state court action was pending.

9. This action is not an action described in 28 U.S.C. § 1445 (a) through (d).

10. Pursuant to 28 U.S.C. § 1446 (d), a true and accurate copy of this Notice of Removal will be filed with the Clerk of the Twenty-Second Judicial Circuit Court, St. Louis City, Missouri, as Notice to Clerk of Filing Removal.

11. Ameren, by this Notice, has satisfied all jurisdictional requirements for the removal of this action from the Twenty-Second Judicial Circuit Court of St. Louis City, Missouri, to the United States District Court for the Eastern District of Missouri.

12. Also filed with this Notice of Removal is the Civil Cover Sheet and the Original Filing Form.

WHEREFORE, Ameren gives notice that the above-captioned action is hereby removed to the United States District Court for the Easter District of Missouri, for the reasons set forth above.

RESPECTFULLY SUBMITTED,

**TUETH KEENEY COOPER  
MOHAN & JACKSTADT, P.C.**

By: /s/ Margaret A. Hesse  
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*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was sent via the Court's electronic filing system and via electronic mail on this 30th day of October 2020, upon the following:

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*Attorneys for Plaintiff*

/s/ Margaret A. Hesse